

RECEIVED

NOV 2 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RM-8094

No. of Copies rec'd  
List A B C D E

devices.<sup>1</sup> GTE supported TIA's April 30, 1990 Petition and urged the Commission to consider CT-1 devices separate from PCS.<sup>2</sup> The April 30, 1992 Petition sought spectrum on a primary basis for CT-1 devices. The current Petition seeks thirty frequencies near 44 and 49 MHz which are allocated to the PLMRS to be additionally allocated on a secondary basis for use with CT-1 devices. TIA proposes that all CT-1 devices which are to use this new spectrum contain a frequency-monitoring mechanism to automatically monitor these frequencies and prevent transmitter activation on frequencies on which cochannel signals are present. (Petition, ¶7) This will protect both the cordless telephones and the PLMRS licensees from harmful interference according to TIA. (Id., ¶12)

GTE offers no technical comments on TIA's Petition, but does support the Commission issuing a Notice of Proposed Rule Making to investigate the need for additional spectrum for CT-1 devices. GTE urged such a separate Rulemaking in its Comments in the PCS Docket regarding the April 30, 1990 Petition. Since the Commission has indicated that it intends to initiate a separate proceeding to "consider allocating additional 46/49 MHz spectrum for CT-1 services," PCS NPRM, ¶9, N.3, GTE recommends the Commission include this Petition in that proceeding. The two Petitions both seek additional spectrum for

---

<sup>1</sup> See TIA Petition for Rule Making in the Matter of Amendment of the Commission's Rules to Allocate Additional Spectrum for Cordless Telephones on a Primary and Protected Basis (Apr. 30, 1990) ("April 30, 1990 Petition"). The Commission included the April 30, 1990 Petition in its Inquiry on Personal Communications Services ("PCS"), GEN Docket No. 90-314, 5 FCC Rcd 3995 (1990). In its recent Notice of Proposed Rulemaking and Tentative Decision in that Docket, FCC 92-333 (Aug. 14, 1992) ("PCS NPRM"), the FCC decided to investigate spectrum for CT-1 devices in a separate proceeding. (PCS NPRM, ¶9, N.3)

<sup>2</sup> See Comments of GTE Service Corp. at 6-7, GEN Docket No. 90-314 (Oct. 1, 1990).

CT-1 devices; technically, they offer different approaches. By including both technical approaches in the same proceeding, interested parties can do a side-by-side comparison.

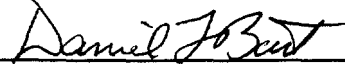
**CONCLUSION**

The Commission should issue a Notice of Proposed Rule Making in response to the TIA Petition, and also include the April 30, 1990 Petition in the same Notice.

Respectfully submitted,

**GTE SERVICE CORPORATION**, on  
behalf of its domestic affiliated  
telephone, equipment, and service  
companies

By: \_\_\_\_\_



Daniel L. Bart  
1850 M Street, N.W.  
Suite 1200  
Washington, DC 20036  
202-463-5212

November 2, 1992

Their Attorney

## Certificate of Service

I, Jennifer R. McCain, hereby certify that a copy of the foregoing "GTE's Comments" has been mailed by first class United States mail, postage prepaid, on the 2nd day of November, 1992 to the following party:

William J. Cole, Chairman  
Personal Communications Section  
Telecommunications Industry Association  
2001 Pennsylvania Ave., NW Suite 800  
Washington, DC 20006-1813

  
Jennifer R. McCain